

**Exhibit I**

**Demand Letter**

## LAW OFFICES OF TERENCE F. TRAVERSO, P.S.

1408 140<sup>TH</sup> PLACE NORTHEAST, SUITE 140  
BELLEVUE, WASHINGTON 98007  
PHONE: (425) 453-0115  
FAX: (425) 412-4060

### SENT BY PROCESS SERVER

August 26, 2020

Mr. Edwin G. Miguel  
2636 Marvin Road S.E.  
Lacey, Washington 98503

17805 29<sup>th</sup> Dr. S.E.  
Bothell, Washington 98012

Re: *Hawkins v. Edwin Miguel*  
Snohomish County Superior Court cause no.: 18-2-08480-31

Dear Mr. Miguel:

My office represents Shelley Hawkins. You were involved in a motor vehicle collision on November 16, 2016, which injured Ms. Hawkins. We tried to settle her injury claim with your insurance company by agreement and without a lawsuit. That insurer was supposed to be there to protect you, but it instead ignored my communications and refused to settle the claim. As a result, we were forced to file a lawsuit against you.

Your insurer then ignored that lawsuit, and that caused a court Judgment to be entered against you. The amount of that court Judgment with ongoing interest, as of September 2, 2020, is \$440,827.61. This is the amount you owe. Enclosed are copies of the Order of Default, and Findings of Fact and Conclusions of Law supporting the judgment, proving this court Judgment amount against you.

I also enclose a Notice of Deposition and a Subpoena. Because you are now a Judgment Debtor, these documents require you to appear in my office at 9 a.m. on September 10, 2020, and to bring with you your financial paperwork related to bank accounts, wages, all property owned, and so forth.

I can free you from this judgment and subpoena, however. This is the worst case of insurance bad faith conduct I have ever seen. Your insurer should have to pay, not you. Hopefully, the

Mr. Edwin Miguel  
August 26, 2020  
Page 2

insurer and their lawyer will not recommend that you file a bankruptcy when the insurer should be obligated to pay for its gross negligence in mishandling the claim.

I would like to discuss this with you. However, I cannot help you, and our offer to free you from paying this judgment is withdrawn, if you contact your insurance company. Please instead call my office at (425) 453-0115 to talk about this. If I am unavailable, please schedule a time with my assistant when I can call you back.

It is very important that you call me. If I do not hear from you, you will be required to appear at my office with all your materials at 9 a.m. on September 10<sup>th</sup>, pursuant to the Subpoena.

Thank you very much for your cooperation. I look forward to speaking with you.

Very truly yours,

*signed without signature to avoid delay*

Terence F. Traverso

TFT:kk  
Enclosures  
cc: client